Safety Attribute Inspection (SAI) Data Collection Tool 7.2.1 Safety Program (Ground and Flight) (OP)

ELEMENT SUMMARY INFORMATION

Purpose of this Element (certificate holder's responsibility):

 To ensure a comprehensive and effective Safety Program (Ground and Flight) is established and maintained to the highest possible degree of safety.

Objective (FAA oversight):

- To determine if the certificate holder's Safety Program (Ground and Flight) meets all applicable requirements of Title 14 of the Code of Federal Regulations (14 CFR) and FAA policies.
- To determine if the certificate holder's Safety Program (Ground and Flight) incorporates the safety attributes.
- To identify any shortfalls in the certificate holder's Safety Program (Ground and Flight).

Specific Instructions:

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SUPPLEMENTAL INFORMATION

Specific Regulatory Requirements (SRRs):

SRRs:

119.65(a)

119.65(a)(1)

119.65(d)

119.65(e)(1)

119.65(e)(2)

119.65(e)(3)

121.135(a)(1)

121.135(b)(1)

121.135(b)(2)

121.135(b)(3)

Related CFRs & FAA Policy/Guidance:

Related CFRs:

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FAA Policy/Guidance:

Title 49 USC, subtitle VII, part A, chapter 447, paragraphs 44701 and 44702

FAA Order 8740.1D

HBAT 99-19

HBAT 00-08

HBAW 00-07

AC 120-66B

AC 00-58

AC 120-59

SAI SECTION 1 - PROCEDURES ATTRIBUTE

Objective: Procedures, instructions, and information contained in the certificate holder's manual are documented methods for accomplishing a process. Policies contained in the certificate holder's manual should establish the certificate holder's compliance posture. Policies may not be stand-alone statements but may be imbedded within procedures, instructions, or information regarding a particular regulatory requirement. The questions in this section of the data collection tool (DCT) are designed to assist the inspector in determining if the certificate holder's manual has documented or prescribed methods of accomplishing the process requirements that provide answers to the associated questions regarding who, what, when, where, and how. This section contains policy questions, procedural questions, and instructional or informational questions pertaining to various types of certificate holder requirements such as actions, prohibitions, or resources (i.e., personnel, facilities, equipment, technical data, etc.).

Tasi	Tasks	
	To meet this objective, the inspector must accomplish the following tasks:	
1.	Review the information listed in the Supplemental Information section of this DCT.	
2.	Review the duties and responsibilities for management and other personnel identified by the certificate holder who accomplish the Safety Program (Ground and Flight).	
3.	Review the certificate holder's manual to ensure that it contains policies, procedures, instructions, and information necessary for the Safety Program (Ground and Flight).	

Questions		
	To meet this objective, the inspector must answer the following questions:	
1.	Does the certificate holder's manual content meet the specific regulatory and FAA policy requirements for a Safety Program (Ground and Flight):	
1.1.	Does the certificate holder's manual contain general policies for the Safety Program (Ground and Flight) that comply with the SRRs? SRRs: 119.65(a); 119.65(d); 119.65(e)(1); 119.65(e)(2); 119.65(e)(3); 121.135(b)(1) Related Design JTIs: 1. Check that the Certificate Holder's manual has a general policy that a qualified person will serve full time in the position, or equivalent position, of Director of Safety (DOS). Sources: 119.65(a)(1); 121.135(b)(1) Interfaces: 7.1.3(AW); 7.1.3(OP)	☐ Yes ☐ No, Explain
1.2.	Does the certificate holder's manual reference the appropriate Federal Aviation Regulations listed in the Supplemental Information section of this safety attribute inspection (SAI)? SRRs: 121.135(b)(3)	☐ Yes ☐ No, Explain
1.3.	Does the certificate holder's manual contain the duties and responsibilities for personnel who will accomplish the Safety Program (Ground and Flight)? SRRs: 121.135(b)(2)	☐ Yes ☐ No, Explain
1.4.	Does the certificate holder's manual include instructions and information for personnel to meet the requirements of the Safety Program (Ground and Flight)? SRRs: 121.135(a)(1)	☐ Yes ☐ No, Explain
1.5.	Does the certificate holder's manual specify the required qualified and full-time	Yes

	personnel to manage the Safety Program (Ground and Flight)? SRRs: 119.65(a)(1)	☐ No, Explain
1.6.	Does the certificate holder's manual specify the qualifications and working knowledge for the required management personnel managing the Safety Program (Ground and Flight)? SRRs: 119.65(d)	Yes No, Explain
1.7.	Does the certificate holder's manual contain current data; names and addresses, duties, responsibilities, and authority of required management personnel managing the Safety Program (Ground and Flight)? SRRs: 119.65(e)(1); 119.65(e)(2); 119.65(e)(3)	Yes No, Explain
1.8.	Does the certificate holder's Safety Program (Ground and Flight) comply with the guidance contained in FAA Order 8740.1D? SRRs: 121.135(a)(1) Related Design JTIs: 1. Check that the Certificate Holder specifies how elements that should be considered in an Air Carriers workable safety program should include an active Aviation Safety Education Program. Sources: 121.135(b)(24); Order 8740.1D Chapter 16, Section 1, 3.A(6) & 4 Interfaces: 7.1.3(AW); 7.1.3(OP)	☐ Yes ☐ No, Explain
1.9.	Does the certificate holder's Safety Program (Ground and Flight) comply with the guidance contained in FAA Flight Standards Handbook Bulletin HBAT 99-19? SRRs: 121.135(a)(1) Related Design JTIs: 1. Check that the Certificate Holder has a safety department that addresses the broad range of risks involved in commercial aviation to include, but not limited to, flight, maintenance, and ground safety. Sources: 121.135(b)(24); HBAT 99-19 (3)(B) Interfaces: 7.1.3(AW); 7.1.3(OP) 2. Check that the Certificate Holder specifies that the primary objectives of a safety program should be to motivate safe actions through establishment of a dynamic corporate safety culture; identify hazards to safe operations; work with other company departments to develop and implement safety interventions; monitor intervention strategies to validate effectiveness; and communicate the results throughout the air carrier. Sources: HBAT 99-19 (3)(C)	☐ Yes☐ No, Explain
	 Interfaces: 7.1.3(AW); 7.1.3(OP) Check that the Certificate Holder specifies how the safety program would include a safety structure and staff that is appropriate to the size of the operator, the kind and scope of operations, and the type and number of aircraft used in its operations. Sources: HBAT 99-19 (4)(A)(1) Interfaces: 7.1.3(AW); 7.1.3(OP) 	
	4. Check that the Certificate Holder's manual system includes procedures that explain how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier. Sources: HBAT 99-19 (4)(A)(2)	

Interfaces: 2.1.1(AW); 2.1.1(OP); 2.1.2(AW); 2.1.2(OP); 7.1.3(AW); 7.1.3(OP)

5. Check that the Certificate Holder's manual system includes procedures that explain how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier, including its safety incident/accident reporting system.

Sources: HBAT 99-19 (4)(A)(2)(a) Interfaces: 3.1.4(OP); 4.2.5(OP)

6. Check that the Certificate Holder's manual system includes procedures that explain how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier, including accident/incident investigations.

Sources: HBAT 99-19 (4)(A)(2)(b) Interfaces: 7.1.3(AW); 7.1.3(OP)

 Check that the Certificate Holder's manual system includes procedures that explain how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier, including safety audits and inspections.

Sources: HBAT 99-19 (4)(A)(2)(c) Interfaces: 7.1.3(AW); 7.1.3(OP)

8. Check that the Certificate Holder's manual system includes procedures that explain how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier, including an internal evaluation program.

Sources: HBAT 99-19 (4)(A)(2)(d) Interfaces: 7.1.3(AW); 7.1.3(OP)

9. Check that the Certificate Holder's manual system includes procedures that explain how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier, including an operational risk assessment program.

Sources: HBAT 99-19 (4)(A)(2)(e) Interfaces: 7.1.3(AW); 7.1.3(OP)

 Check that the Certificate Holder's manual system includes procedures that explain how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier, including open reporting systems.

Sources: HBAT 99-19 (4)(A)(2)(f) Interfaces: 7.1.3(AW); 7.1.3(OP)

11. Check that the Certificate Holder's manual system includes procedures that explain how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier, including routine monitoring and trend analysis programs.

Sources: HBAT 99-19 (4)(A)(2)(g) Interfaces: 7.1.3(AW); 7.1.3(OP)

12. Check that the Certificate Holder's manual system includes procedures that explain how safety program elements have been developed, properly integrated, and coordinated throughout the air carrier, including review of external evaluation programs.

Sources: HBAT 99-19 (4)(A)(2)(h) Interfaces: 7.1.3(AW); 7.1.3(OP)

13. Check that the Certificate Holder's manual system includes procedures that explain how safety program elements have been developed,

	properly integrated, and coordinated throughout the air carrier, including Safety Committee(s).	
	Sources: HBAT 99-19 (4)(A)(2)(i)	
	Interfaces: 7.1.3(AW); 7.1.3(OP)	
1.10.	Does the certificate holder's Safety Program (Ground and Flight) comply with the guidance contained in FAA Flight Standards Handbook Bulletin HBAW 00-07?	☐ Yes ☐ No, Explain
	SRRs: 121.135(a)(1)	
1.11.	Does the certificate holder's Safety Program (Ground and Flight) comply with the guidance contained in FAA Advisory Circular 00-58? SRRs: 121.135(a)(1) Related Design JTIs:	☐ Yes ☐ No, Explain
	 Check that when the Certificate Holder detects a violation it expeditiously discloses it to the FAA, and takes prompt corrective action to ensure that the same or similar violation does not recur. Sources: AC 00-58 	
	Interfaces: 2.1.1(AW); 2.1.1(OP); 2.1.2(AW); 2.1.2(OP); 7.1.3(AW); 7.1.3(OP)	
1.12.	Does the certificate holder's Safety Program (Ground and Flight) comply with the guidance contained in FAA Advisory Circular 120-59? SRRs: 121.135(a)(1)	Yes No, Explain
	Related Design JTIs:	
	 Check that the Certificate Holders manual system includes procedures to identify and resolve safety related issues. 	
	Sources: 121.135(a)(1); AC 120-59	
	Interfaces: 2.1.1(AW); 2.1.1(OP); 2.1.2(AW); 2.1.2(OP); 7.1.3(AW); 7.1.3(OP)	
1.13.	Does the certificate holder's Safety Program (Ground and Flight) comply with the guidance contained in FAA Advisory Circular 120-66B?	Yes No, Explain
	SRRs: 121.135(a)(1)	
	Related Design JTIs:	
	 Check that the Certificate Holder collects safety data, which will be analyzed to develop corrective actions for identified safety concerns and to educate the appropriate parties to prevent a reoccurrence of the same type of safety event. 	
	Sources: AC 120-66B	
	Interfaces: 2.1.1(AW); 2.1.1(OP); 2.1.2(AW); 2.1.2(OP); 7.1.3(AW); 7.1.3(OP)	

SAI SECTION 1 - PROCEDURES ATTRIBUTE Drop-Down Menu

- 1. No procedures, policy, instructions or information specified.
- 2. Procedures or instructions and information do not identify (who, what, when, where, how).
- 3. Procedures, policy or instructions and information do not comply with CFR.
- 4. Procedures, policy or instructions and information do not comply with FAA policy and guidance.
- 5. Procedures, policy or instructions and information do not comply with other documentation (e.g., manufacturer's data, Jeppesen's Charts, etc.).
- 6. Procedures, policy or instructions and information unclear or incomplete.
- 7. Documentation quality (e.g., unreadable or illegible).
- 8. Procedures, policy or instructions and information inconsistent across Certificate Holder manuals (FOM Flight Operations Manual to GMM General Maintenance Manual, etc.).
- 9. Procedures, policy or instructions and information inconsistent across media (e.g., paper, microfiche, electronic).
- 10. Resource requirements incomplete (personnel, facilities, equipment, technical data).
- 11. Other.

SAI SECTION 2 - CONTROLS ATTRIBUTE

Objective: Controls are checks and restraints designed into a process to ensure a desired result. The questions in this section of the DCT are designed to assist the inspector in determining if checks and restraints are designed into the process to ensure the desired result is achieved. Controls should be written into the manual system to ensure that the most important manual policies, procedures, or instructions and information will be followed.

Controls may be in the form of administrative controls, which are secondary or supplemental written procedures. Like written procedures, administrative controls also need to provide answers to questions regarding who, what, when, where, and how. Controls may also be in the form of engineered controls, such as automated features or mechanical actions or devices (i.e., safety devices, warning devices, etc.).

	regarding who, what, when, where, and how. Controls may also be in the form of engineered controls, such as automated features or mechanical actions or devices (i.e., safety devices, warning devices, etc.).		
Tasks			
	To meet this objective, the inspector must accomplish the following tasks:		
1.	Review the control questions below.		
2.	Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the controls that it has documented.		

Questions		
	To meet this objective, the inspector must answer the following questions:	
1.	Are the following controls built into the Safety Program (Ground and Flight):	
1.1	Is there a control in place to ensure that the certificate holder provides incident/accident reports that are required by its Safety Program (Ground and Flight)?	☐ Yes ☐ No, Explain
1.2.	Is there a control in place to ensure that all accidents/incidents are investigated in a timely manner?	☐ Yes ☐ No, Explain
1.3.	Is there a control in place to ensure that safety audits/inspections are conducted as specified by the certificate holder's Safety Program (Ground and Flight)?	☐ Yes ☐ No, Explain
1.4.	Is there a control to ensure that the Internal Evaluation Program (IEP) is used?	☐ Yes ☐ No, Explain
1.5.	Is there a control in place to ensure that an Operational Risk Assessment Program is used?	☐ Yes ☐ No, Explain
1.6.	Is there a control in place to ensure that the Operational Risk Assessment Program includes one of the risks such as flight, maintenance, or ground safety?	☐ Yes ☐ No, Explain
1.7.	Is there a control in place to ensure that the Open Reporting System is used?	☐ Yes ☐ No, Explain
1.8.	Is there a control in place to ensure that identified safety concerns are communicated to the appropriate parties to prevent a reoccurrence of those concerns?	☐ Yes ☐ No, Explain
1.9.	Is there a control in place to ensure that routine monitoring and trend analysis programs are used?	☐ Yes ☐ No, Explain
1.10.	Is there a control in place to ensure that the results from external evaluation programs are reviewed?	Yes No, Explain

1.11.	Is there a control in place to ensure that the safety committee meets as specified by the certificate holder's Safety Program (Ground and Flight)?	☐ Yes ☐ No, Explain
1.12.	Is there a control in place to ensure that the emergency response plan is kept current?	☐ Yes ☐ No, Explain
1.13.	Is there a control in place to ensure that the employees/contractors are provided with safety awareness information?	☐ Yes ☐ No, Explain
1.14.	Is there a control in place to ensure that the employees/contractors are provided with safety education?	☐ Yes ☐ No, Explain
1.15.	Is there a control in place to ensure that the Director of Safety is qualified for the position?	☐ Yes ☐ No, Explain
1.16.	Is the identified control effective in ensuring that the size and scope of the safety structure is appropriate to the certificate holder?	☐ Yes ☐ No, Explain
2.	Does the certificate holder have a documented method for assessing the impact of any changes made to the controls in the Safety Program (Ground and Flight)?	☐ Yes ☐ No, Explain

	SAI SECTION 2 - CONTROLS ATTRIBUTE Drop-Down Menu
1.	No controls specified.
2.	Documentation for the controls do not identify (who, what, when, where, how).
3.	Controls incomplete.
4.	Controls could be circumvented.
5.	Controls could be unenforceable.
6.	Resource requirements incomplete (personnel, facilities, equipment, technical data).
7.	Other.

SAI SECTION 3 - PROCESS MEASUREMENT ATTRIBUTE

Objective: Process measurements are used by the certificate holder to measure and assess its processes, to identify and correct problems or potential problems, and to make improvements to the processes. The questions in this section of the DCT are designed to assist the inspector in determining if the certificate holder measures or assesses information to identify, analyze, and document potential problems with the process. Process measurements are a certificate holder's internal evaluation or auditing of the most important policies, procedures, or instructions and information associated with an element.

To prevent the duplication of work, process measurements are most commonly addressed through a combination of auditing features contained in both the certificate holder's safety program/internal evaluation program (for operations and cabin safety-related issues) and the auditing function of the Continuous Analysis and Surveillance System (for airworthiness or maintenance/inspection-related issues). The director of safety and the quality assurance department often work together to accomplish this function for the certificate holder. This approach requires amendment of the safety program/internal evaluation program audit forms or checklists and the Continuous Analysis and Surveillance System audit forms or checklists to include the specific process measurements for each element.

Tasks	
	To meet this objective, the inspector must accomplish the following tasks:
1.	Review the process measurement questions below.
2.	Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the process measurements that it has documented.

Questions		
	To meet this objective, the inspector must answer the following questions:	
1.	Does the certificate holder's Safety Program (Ground and Flight) include the following process measurements:	
1.1.	Process measurements that would reveal if the safety incident/accident reporting system failed to provide the reports as specified by the certificate holder's Safety Program (Ground and Flight)?	☐ Yes ☐ No, Explain
1.2.	Process measurements that would reveal if accidents/incidents failed to be investigated in a timely manner?	☐ Yes ☐ No, Explain
1.3.	Process measurements that would reveal if safety audits/inspections failed to be conducted as specified by the certificate holder's Safety Program (Ground and Flight)?	☐ Yes ☐ No, Explain
1.4.	Process measurements that would reveal if the Internal Evaluation Program (IEP) failed to be used?	☐ Yes ☐ No, Explain
1.5.	Process measurements that would reveal if the Operational Risk Assessment Program failed to be used?	☐ Yes ☐ No, Explain
1.6.	Process measurements that would reveal if the Operational Risk Assessment Program failed to include one of the risks such as flight, maintenance, or ground safety?	☐ Yes ☐ No, Explain
1.7.	Process measurements that would reveal if the Open Reporting System failed to be used?	☐ Yes ☐ No, Explain
1.8.	Process measurements that would reveal if identified safety concerns failed to be communicated to the appropriate parties to prevent those concerns from	☐ Yes ☐ No, Explain

	recurring?	
1.9.	Process measurements that would reveal if routine monitoring and trend analysis programs failed to be used?	☐ Yes ☐ No, Explain
1.10.	Process measurements that would reveal if results from external evaluation programs failed to be reviewed?	☐ Yes ☐ No, Explain
1.11.	Process measurements that would reveal if the safety committee failed to meet as specified by the certificate holder's Safety Program (Ground and Flight)?	☐ Yes ☐ No, Explain
1.12.	Process measurements that would reveal if the emergency response plan failed to be current?	☐ Yes ☐ No, Explain
1.13.	Process measurements that would reveal if employees/contractors failed to be provided with safety awareness information?	☐ Yes ☐ No, Explain
1.14.	Process measurements that would reveal if employees/contractors failed to be provided with safety education?	☐ Yes ☐ No, Explain
1.15.	Process measurements that would reveal if the Director of Safety failed to be qualified for the position?	☐ Yes ☐ No, Explain
1.16.	Process measurements that would reveal if the size and scope of the safety structure failed to be appropriate for the certificate holder?	☐ Yes ☐ No, Explain
2.	Is there a process measurement or process measurements that would identify if the certificate holder's policy, procedures, instructions, and information contained in its manual were not followed?	☐ Yes ☐ No, Explain
3.	Does the certificate holder document its process measurement methods and results?	☐ Yes ☐ No, Explain
4.	Does the certificate holder's manual provide for the use of process measurement results to improve its programs?	☐ Yes ☐ No, Explain
5.	Does the organization that conducts the process measurements have direct access to the person with responsibility for the Safety Program (Ground and Flight)?	☐ Yes ☐ No, Explain

SAI SECTION 3 - PROCESS MEASUREMENT ATTRIBUTE Drop-Down Menu

- 1. No process measurements specified.
- 2. Documentation for the process measurements does not identify (who, what, when, where, how).
- 3. Inability to identify negative findings.
- 4. No provisions for implementing corrective actions.
- 5. Ineffective follow-up to determine effectiveness of corrective actions.
- 6. Resources requirements (personnel, facilities, equipment, technical data).
- 7. Other.

SAI SECTION 4 - INTERFACES ATTRIBUTE

Objective: Interfaces are used by the certificate holder to identify and manage the interactions between processes. The questions in this section of the DCT are designed to assist the inspector in determining whether or not interactions between the policies, procedures, or instructions and information associated with other independent processes within the certificate holder's organization are documented. Written policies, procedures, or instructions and information that are interrelated and located in different manuals within the certificate holder's manual system must be consistent and complement each other. For the interfaces to be effectively managed, it is not only important to identify what the interfaces are, but it is imperative to document the specific location of the interfaces within the certificate holder's manual system.

Tasl	Tasks	
	To meet this objective, the inspector must accomplish the following tasks:	
1.	Review the interfaces associated with the Safety Program (Ground and Flight) that have been identified along with the individual questions in section 1, Procedures, of this DCT.	
2.	Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the interfaces that it has documented.	

Questions			
	To meet this objective, the inspector must answer the following questions: NOTE: The design job task items (JTIs) displayed with the questions in section 1, Procedures, of this DCT identify potential interfaces (by element number) for this element.		
1.	Does the certificate holder's manual properly address the interfaces that are identified along with the individual questions in section 1, Procedures, of this DCT?	☐ Yes ☐ No, Explain	
2.	Does the certificate holder's manual document a method for assessing the impact of any changes to the associated interfaces within the Safety Program (Ground and Flight)?	☐ Yes ☐ No, Explain	

SAI SECTION 4 - INTERFACES ATTRIBUTE Drop-Down Menu

- 1. No interfaces specified.
- 2. The following interfaces not identified within the Certificate Holder's manual system:
- 3. Interfaces listed are inaccurate.
- 4. Specific location of interfaces not identified within the manual system.
- 5. Other

SAI SECTION 5 - MANAGEMENT RESPONSIBILITY & AUTHORITY ATTRIBUTES

Objective: The questions in this section of the DCT address the responsibility and authority of the process. They are designed to assist the inspector in determining if there is a clearly identifiable, qualified, and knowledgeable person who is responsible for the process, is answerable for the quality of the process, and has the authority to establish and modify the process. (The person with the authority may or may not be the person with the responsibility.)

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Tasks			
	To meet this objective, the inspector must accomplish the following tasks:		
1.	Identify the person who has overall responsibility for the Safety Program (Ground and Flight).		
2.	Identify the person who has overall authority for the Safety Program (Ground and Flight).		
3.	Review the duties and responsibilities of the person(s) documented in the certificate holder's manual.		
4.	Review the appropriate organizational chart.		

Questions			
	To meet this objective, the inspector must answer the following questions:		
1.	Does the certificate holder's manual clearly identify who is responsible for the quality of the Safety Program (Ground and Flight)?	Yes No, Explain Name/Title:	
2.	Does the certificate holder's manual clearly identify who has authority to establish and modify the policies, procedures, instructions, and information for the Safety Program (Ground and Flight)?	Yes No, Explain Name/Title:	
3.	Does the certificate holder's manual include the duties and responsibilities of those who manage the work required by the Safety Program (Ground and Flight)? SRRs: 121.135(b)(2)	Yes No, Explain	
4.	Does the certificate holder's manual include instructions and information for those who manage the work required by the Safety Program (Ground and Flight)? SRRs: 121.135(a)(1)	☐ Yes ☐ No, Explain	
5.	Does the certificate holder's manual clearly and completely document the authority for this position?	☐ Yes ☐ No, Explain	
6.	Does the certificate holder's manual clearly and completely document its qualification standards for the person having responsibility for the Safety Program (Ground and Flight)?	Yes No, Explain	
7.	Does the certificate holder's manual clearly and completely document its qualification standards for the person having authority to establish and modify the certificate holder's policies, procedures, instructions, and information for the Safety Program (Ground and Flight)?	Yes No, Explain	
8.	Does the certificate holder's manual clearly and completely document the procedures for delegation of authority for the Safety Program (Ground and Flight)?	Yes No, Explain	

SAI SECTION 5 - MANAGEMENT RESPONSIBILITY & AUTHORITY ATTRIBUTES Drop-Down Menu

- 1. Not documented.
- 2. Documentation unclear.
- 3. Documentation incomplete.
- 4. Other.